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12 OLD REPUBLIC NATIONAL TITLE INSURANCE
13 COMPANY and OLD REPUBLIC TITLE COMPANY OF
14 NEVADA

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 BANK OF AMERICA, N.A.,

18 Plaintiff,

19 vs.

20 OLD REPUBLIC NATIONAL TITLE
21 INSURANCE COMPANY; OLD REPUBLIC
22 TITLE COMPANY OF NEVADA; DOES I
23 through X; and ROES XI through XX,

24 Defendants.

Case No.: 2:21-cv-00454-GMN-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEFENDANT
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY'S AND OLD
REPUBLIC TITLE COMPANY OF
NEVADA'S TIME TO RESPOND TO
COMPLAINT**

(First Request)



1 Defendants Old Republic National Title Insurance Company (“Old Republic”) and Old
2 Republic Title Company of Nevada (“OR Agency”), and plaintiff Bank of America, N.A.
3 (“BANA”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as
4 follows:

5 **WHEREAS**, BANA commenced the action by filing a Complaint on March 18, 2021, in
6 the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-21-831366-
7 C);

8 **WHEREAS**, on March 18, 2021, Old Republic filed a Petition of Removal with this
9 Court based upon diversity jurisdiction (ECF No. 1);

10 **WHEREAS**, on March 26, 2021, BANA served OR Agency with the complaint and
11 summons;

12 **WHEREAS**, on April 13, 2021, Old Republic filed a Supplemental and Amended Petition
13 of Removal (ECF No. 7);

14 **WHEREAS**, on April 14, 2021, Old Republic accepted service of the complaint and
15 summons through its counsel of record;

16 **WHEREAS**, OR Agency’s response to the complaint is due on April 16, 2021;

17 **WHEREAS**, Old Republic’s response to the complaint is due on May 5, 2021;

18 **WHEREAS**, Old Republic and OR Agency are requesting an extension of time to respond
19 to the complaint to afford Old Republic’s counsel additional time to review, analyze and respond
20 to BANA’s complaint and so that Old Republic and OR Agency can jointly respond;

21 **WHEREAS**, BANA has agreed to extend Old Republic and OR Agency’s time to respond
22 to the complaint to May 14, 2021; and

23 **WHEREAS**, this is the first stipulation for an extension of Old Republic and OR
24 Agency’s time to respond to the complaint.

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Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate and agree as follows:

1. Old Republic and OR Agency shall respond to the complaint on or before May 14, 2021.
2. Old Republic and OR Agency intend to preserve their rights and do not expressly waive any and all defenses listed in Fed. R. Civ. P. 12(b).

DATED this 14th day of April, 2021 DATED this 14th day of April, 2021

WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

/s/-Lindsay D. Robbins

/s/-Sophia S. Lau

By: _____

By: _____

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BANK OF AMERICA, N.A.

Attorneys for Defendants
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY and OLD
REPUBLIC TITLE COMPANY OF
NEVADA

ORDER

IT IS SO ORDERED.

Dated: April 14, 2021

By: *Raymond J. Zouchak*
UNITED STATES MAGISTRATE JUDGE

